

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

<p>KARL A. KLEINSCHROD, on behalf of himself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC. f/n/a THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, JOHN C. TREACY, CAROLYN H. BYRD, JOHN H. DASBURG, JANET DOLAN, KENNETH M. DUBERSTEIN, LAWRENCE G. GRAEV, THOMAS R. HODGSON, WILLIAM H. KLING, JAMES A. LAWRENCE, JOHN A. MacCOLL, GLEN D. NELSON, and GORDON M. SPRENGER,</p> <p style="text-align: center;">Defendants.</p>	<p>04-3801 JRT/FLN</p>
<p>EMPIRE PARTNERS, LLP, and SUSAN N. COHEN,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES INC., TRAVELERS PROPERTY CASUALTY CORP., THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, ROBERT I. LIPP, and JAY S. BENET,</p> <p style="text-align: center;">Defendants.</p>	<p>04-3834 MJD/JGL</p>

(Additional Captions Below)

**MOTION OF WALTER E. RYAN, JR. FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

<p>ROBERT STROUGO, on behalf of himself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC. f/k/a THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, JOHN C. TREACY, CAROLYN H. BYRD, JOHN H. DASBURG, JANET DOLAN, KENNETH M. DUBERSTEIN, LAWRENCE G. GRAEV, THOMAS R. HODGSON, WILLIAM H. KLING, JAMES A. LAWRENCE, JOHN A. MacCOLL, GLEN D. NELSON, and GORDON M. SPRENGER,</p> <p style="text-align: center;">Defendants.</p>	<p>04-3847 JM/FLN</p>
<p>VINCENT VINCI, Individually and On Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC., f/n/a THE PAUL COMPANIES, INC., JAY FISHMAN, THOMAS A. BRADLEY, ROBERT I. LIPP, and JOHN C. TREACY,</p> <p style="text-align: center;">Defendants.</p>	<p>04-3833 JRT/FLN</p>

(Additional Captions Below)

**MOTION OF WALTER E. RYAN, JR. FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, APPROVAL OF
SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

<p>CYNTHIA SHERMAN, on behalf of herself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC., f/n/a THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, and THOMAS A. BRADLEY,</p> <p>Defendants.</p>	<p>04-3863 MJD/JGL</p>
<p>JANE RAISFELD, on behalf of herself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>ST. PAUL TRAVELERS COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, JOHN C. TREACY, CAROLYN H. BYRD, JOHN H. DASBURG, JANET DOLAN, KENNETH H. DUBERSTEIN, LAWRENCE G. GRAEV, THOMAS R. HODGSON, WILLIAM H. KLING, JAMES A. LAWRENCE, JOHN A. MACCOLL, GLEN D. NELSON, M.D., and GORDON M. SPRENGER,</p> <p>Defendants.</p>	<p>04-3875 DWF/JSM</p>

(Additional Captions Below)

**MOTION OF WALTER E. RYAN, JR. FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

<p>KEITH DONATO, on behalf of himself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC. f/k/a THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, JOHN C. TREACY, CAROLYN H. BYRD, JOHN H. DASBURG, JANET DOLAN, KENNETH M. DUBERSTEIN, LAWRENCE G. GRAEV, THOMAS R. HODGSON, WILLIAM H. KLING, JAMES A. LAWRENCE, JOHN A. MacCOLL, GLEN D. NELSON, and GORDON M. SPRENGER,</p> <p>Defendants.</p>	<p>04-3874 JRT/FLN</p>
<p>MARK G. EPSTEIN, on behalf of himself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC., f/n/a THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, and THOMAS A. BRADLEY,</p> <p>Defendants.</p>	<p>04-3884 DWF/JSM</p>

(Additional Captions Below)

**MOTION OF WALTER E. RYAN, JR. FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

<p>WALTER E. RYAN, JR., and MOSES SEMEL,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ST. PAUL TRAVELERS COMPANIES, INC., ROBERT L LIPP, JAY S. FISHMAN, JAY S. BENET, JOHN A. MACCOLL, HOWARD P. BERKOWITZ, KENNETH J. BIALKIN, LESLIE D. DISHAROON, MARYL D. HARTZBAND, BLYTHE J. MCGARVIE, CLARENCE OTIS, JR., JEFFREY M. PEEK, NANCY A. ROSEMAN, CHARLES W. SCHARF, FRANK J. TASCO, LAURIE J. THOMSEN, CAROLYN HOGAN BYRD, JOHN H. DASBURG, JANET M. DOLAN, KENNETH M. DUBERSTEIN, LAWRENCE G. GRAEV, THOMAS R. HODGSON, WILLIAM H. KLING, JAMES A. LAWRENCE, GLEN D. NELSON, GORDON M. SPRENGER, THOMAS A. BRADLEY, and JOHN C. TREACY,</p> <p>Defendants.</p>	<p>04-3888 MJD/JGL</p>
<p>PAUL GREEN, on behalf of herself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC., f/K/a THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, ROBERT I. LIPP, and JOHN C. TREACY,</p> <p>Defendants.</p>	<p>04-3886 JRT/FLN</p>

(Additional Captions Below)

<p>MICHAEL KINTZER, on behalf of himself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, TRAVELERS PROPERTY CASUALTY CORP., THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, ROBERT I. LIPP, and JAY S. BENET,</p> <p>Defendants.</p>	<p>04-4085 JRT/FLN</p>
<p>BRIAN T. VAN ORSDEL, Individually and On Behalf of All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC., TRAVELERS PROPERTY CASUALTY CORP., THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, ROBERT I. LIPP, and JAY S. BENET,</p> <p>Defendants.</p>	<p>04-4137 MJG/JGL</p>

(Additional Caption Below)

**MOTION OF WALTER E. RYAN, JR. FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

<p>R. BERNARD LOMAN, On Behalf of Himself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>THE ST. PAUL TRAVELERS COMPANIES, INC., f/n/a THE ST. PAUL COMPANIES, INC., JAY S. FISHMAN, THOMAS A. BRADLEY, JOHN C. TREACY, CAROLYN H. BYRD, JOHN H. DASBURG, JANET DOLAN, KENNETH M. DUBERSTEIN, LAWRENCE G. GRAEV, THOMAS R. HODGSON, WILLIAM H. KLING, JAMES A. LAWRENCE, JOHN A. MacCOLL, GLEN D. NELSON, and GORDON M. SPRENGER,</p> <p style="text-align: center;">Defendants.</p>	<p>04-4316 DWF/JSM</p>
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**MOTION OF WALTER E. RYAN, JR. FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

Plaintiff Walter E. Ryan, Jr. (“Ryan”) pursuant to Section 21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995, hereby respectfully moves this Court for an order in the form filed herewith: (i) consolidating the above-referenced actions; (ii) appointing Ryan as Lead Plaintiff in the above-referenced actions; and (iii) approving Ryan’s selection of Lead Counsel and Liaison Counsel.

In support of his motion, Ryan submits: (a) Memorandum of Law in Support of Motion of Walter E. Ryan, Jr. for Consolidation, Appointment as Lead Plaintiff, and Approval of Selection of Lead Counsel and Liaison Counsel; and (b) the Declaration of Clinton A. Krislov, sworn to on October 14, 2004, and the exhibits annexed thereto.

DATED: October 15, 2004

Respectfully submitted,

By: s/Karl L. Cambronne
Attorneys for Plaintiffs

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